

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
NORTHERN DIVISION**

BEVERLY CARRIGAN

*

Plaintiff

*

v.

*

Civil Action No.: AMD 02 CV 3808

**PROVIDENT LIFE & ACCIDENT
INSURANCE COMPANY, *et al.***

*

*

Defendants

*

* * * * *

JOINT MOTION TO STAY PROCEEDINGS

The Plaintiff and the Defendant, by their undersigned counsel, respectfully request this Court to order a stay of these proceedings on the following grounds:

1. The parties have conducted serious and substantive settlement negotiations but have not as yet resolved this matter.
2. The parties have now agreed to participate in a mediation before William S. Goodman, Esquire, Henning Mediation & Arbitration Services, Inc. in Atlanta, Georgia, on October 15, 2003.
3. The parties request a stay of this matter in order to permit the mediation process to be completed
4. If this matter is not resolved by the October 15, 2003 mediation, the parties request permission to advise the Court on or before October 22, 2003 of the time required to complete

necessary discovery in this case in Tennessee and Maryland and to prepare and file any necessary dispositive motions.

WHEREFORE, the Plaintiff and the Defendant jointly request this Court to issue the Order attached hereto staying this case pending completion of the October 15, 2003 mediation.

Respectfully submitted,

/s/
Pamela I. Atkins
Galler & Atkins, LLC
1140 Hammond Drive, Suite A-1200
Atlanta, Georgia 30328
(770) 399-2790
Attorneys for Plaintiff

/s/
J. Snowden Stanley, Jr. (Bar No.: 00059)
Semmes, Bowen & Semmes
250 W. Pratt Street
Baltimore, Maryland 21201
(410) 539-5040
Attorneys for Defendants

(B0376762.WPD;1)

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
NORTHERN DIVISION**

BEVERLY CARRIGAN

*

Plaintiff

*

v.

* **Civil Action No.: AMD 02 CV 3808**

**PROVIDENT LIFE & ACCIDENT
INSURANCE COMPANY, *et al.***

*

*

Defendants

*

* * * * *

O R D E R

UPON the foregoing Joint Motion for a Stay, and it appearing that the parties have agreed to submit this matter to mediation on October 15, 1003, it is this _____ day of October, 2003,

ORDERED, that this matter shall be stayed pending completion of that mediation, and that the parties shall report to the Court no later than October 22, 2003.

Date _____

Judge, United States District Court
For the District of Maryland

(B0376762.WPD;1)